

WEIL, GOTSHAL & MANGES LLP
Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Theodore E. Tsekerides (*pro hac vice*)
(theodore.tsekerides@weil.com)
Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

*Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

JONES DAY
Bruce S. Bennett (SBN 105430)
(bbennett@jonesday.com)
Joshua M. Mester (SBN 194783)
(jmester@jonesday.com)
James O. Johnston (SBN 167330)
(jjohnston@jonesday.com)
555 South Flower Street
Fiftieth Floor
Los Angeles, CA 90071-2300
Tel: 213 489 3939
Fax: 213 243 2539

Attorneys for Shareholder Proponents

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF FILING OF DEBTORS' AND
SHAREHOLDER PROPONENTS'
UPDATED OBJECTION SUMMARY
CHART**

1 **PLEASE TAKE NOTICE** that, on September 9, 2019, PG&E Corporation and Pacific Gas and
2 Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-
3 captioned chapter 11 cases, filed the *Debtors’ Joint Chapter 11 Plan of Reorganization* [Dkt. No. 3841],
4 which was thereafter amended, modified, or supplemented on September 23, 2019 and November 4,
5 2019 [Dkt. Nos. 3966 and 4563, respectively].

6 **PLEASE TAKE FURTHER NOTICE** that, on December 12, 2019, the Debtors filed the
7 *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated December 12,*
8 *2019* [Dkt. No. 5101], which was thereafter amended, modified, or supplemented on January 31, 2020,
9 February 7, 2020, March 9, 2020, March 16, 2020, and May 22, 2020 [Dkt. Nos. 5590, 5700, 6217, 6320
10 and 7521, respectively] (and as may be further amended, modified, or supplemented and together
11 with all exhibits and schedules thereto, the “**Plan**”).

12 **PLEASE TAKE FURTHER NOTICE** that, on May 22, 2020, the Debtors filed the *Plan*
13 *Proponents’ Joint Memorandum of Law and Omnibus Response in Support of Confirmation of Debtors’*
14 *and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization* [Dkt. No. 7528] (the
15 “**Memorandum**”). Attached as Exhibit A to the Memorandum was a chart (the “**Objection Summary**
16 **Chart**”) summarizing (i) each of the filed objections and responses to confirmation of the Plan (the
17 “**Objections**”) and (ii) the Plan Proponents’ responses thereto, including whether the Objections were
18 resolved by the parties.

19 **PLEASE TAKE FURTHER NOTICE** that attached hereto as **Exhibit A** is an updated version
20 of the Objection Summary Chart (the “**Updated Objection Summary Chart**”) revised to reflect, as of
21 this filing, the current status of the Objections, including any additional resolutions reached between the
22 parties. Attached hereto as **Exhibit B** is a redline reflecting changes between the Objection Summary
23 Chart and the Updated Objection Summary Chart.

24 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings and other documents
25 identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court’s website at
26 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate
27 Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime Clerk LLC,
28 at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based
29 parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com. Note
30 that a PACER password is needed to access documents on the Bankruptcy Court’s website.

31 Dated: June 5, 2020

32 **WEIL, GOTSHAL & MANGES LLP**
33 **KELLER BENVENUTTI KIM LLP**

34 /s/ Thomas B. Rupp
35 Thomas B. Rupp

36 *Attorneys for Debtors and Debtors in Possession*